

# General Aviation Pilot Licensing Review Phase 2: Aeroplanes

Summary of planned changes

CAP3032C



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# Introduction

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This document contains a summary of key changes in the aeroplane category that will result from the pilot licensing and training simplification project.

Full details of the proposals can be found in [CAP 2974A](#) and associated decisions in our Consultation Response Document (CRD) [CAP 3032A](#). For more information on project background, please visit the [GA webpages](#).

## Next steps

Note that changes are yet to be passed into legislation. We anticipate this taking place in Spring 2025; however, actual timelines are still to be confirmed with the Department for Transport.

In some areas we need to develop appropriate Acceptable Means of Compliance (AMC), Guidance Material (GM) and other CAA publications (CAPs) to support the planned changes to regulation. These will be consulted on in late 2024 or early 2025.

The CAA will communicate implementation times and the details of any transitional arrangements as soon as they are known.

Due to resource constraints in the legislative programme, some areas of policy relating to aeroplanes will not be progressed until 2025, with implementation planned for 2026. This includes changes to:

- Theoretical knowledge procedures and validity periods;
- The aeroplane class rating system;
- Instrument rating and IMC rating.

Further details of changes in these areas will be communicated in the future.

## Chapter 1

# ICAO PPL(A)

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## 1.1 Changes planned for the Part-FCL PPL(A) qualifying experience include:

- Revising the standard qualifying experience requirement from 45 hours flight instruction to 40 hours as pilot of aeroplanes;
- Moving the 25-hour dual training requirement from the implementing rule to Acceptable Means of Compliance (AMC);
- A 35-hour PPL course option when training at an approved training organisation (ATO);
- Crediting flight time previously gained on three axis microlights towards the overall experience requirement for the PPL(A).

## 1.2 Revising the standard qualifying experience from 'flight instruction' to 'flight time' is in accordance with ICAO Annex 1<sup>1</sup> and will potentially allow more credit for previous flying experience, including that on three axis microlight aeroplanes.

## 1.3 Note that it is not proposed to allow the conduct of the PPL(A) course on microlight aeroplanes, however previous flight time may be credited towards the overall experience requirement, for example if the applicant holds a NPPL(A) with microlight class rating.

## 1.4 Moving the 25-hour dual requirement to AMC is in line with Annex 1 and will provide more flexibility to applicants with previous flight time in aeroplanes.

## 1.5 The specific LAPL(A) upgrade requirements will be removed. Existing LAPL(A) holders wishing to upgrade to PPL(A) will be required to:

- Complete a course at an ATO or DTO consisting of dual training for the elements of the PPL(A) syllabus not previously covered;
- Meet the Annex 1 requirement for 10 hours of supervised solo flight time, including at least 5 hours of solo cross-country flight time with at least 1 cross-country flight of at least 270 km (150 NM), during which full stop landings at 2 aerodromes different from the aerodrome of departure shall be made; and
- Pass the PPL(A) skills test.

## 1.6 The changes for the PPL(A) will be primarily embodied in [FCL.210.A](#).

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<sup>1</sup> ICAO Annex 1 to the Convention on International Civil Aviation – Personnel Licensing

## Chapter 2

## Sub-ICAO aeroplane licence

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- 2.1 We have determined that a revised National Private Pilot's Licence (NPPL) will form the basis of a single sub-ICAO aeroplane licence for the UK.
- 2.2 The CAA will cease issuing the LAPL(A) at a time to be determined, likely in 2025. Existing LAPL(A) licences will remain valid indefinitely, and any training or theoretical knowledge exams completed for the LAPL(A) will remain valid for the NPPL(A). The privileges of the revised NPPL(A) and the LAPL(A) will be the same.
- 2.3 The revised NPPL(A) will be available with the following class ratings:
- Single Engine Piston (SEP)
  - Touring Motor Glider (TMG)
  - Microlight Aeroplane
- 2.4 A key difference will be that the holder of an SEP rating on the NPPL(A) may fly microlights after completion of differences training, without the need for another rating. This mirrors the situation for a PPL(A) holder with SEP rating.
- 2.5 The microlight class rating and associated instructor ratings will remain essentially unchanged. Existing holders of Simple Single Engine Aeroplanes (SSEA) or Self Launching Motor Glider (SLMG) will be deemed to hold SEP or TMG ratings respectively.
- 2.6 The revalidation requirements will be similar to the existing ones for the NPPL(A), although it will be possible to complete them on any aircraft the licence holder is rated on.
- 2.7 The practical and theoretical knowledge syllabus will be revised in line with the consultation proposals for 'Option 1' outlined in [CAP 2974A](#), primarily based on the existing three axis microlight requirements.
- 2.8 The detail will be published in the future, but it is our intention to create a new policy document for the sub-ICAO licence that will cover all requirements for training and administration, including upgrade to the PPL(A).
- 2.9 The medical requirement for initial issue of the revised NPPL(A) will continue to be Pilot Medical Declaration (PMD).
- 2.10 We also plan to amend the Air Navigation Order 2016 such that the IMC rating may be endorsed on an NPPL(A).

## Chapter 3

# Revalidation requirements

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- 3.1 A key intention of the project is to align the revalidation requirements for the SEP and TMG ratings across the PPL(A), NPPL(A) and LAPL(A), as well as the microlight class rating on the NPPL(A).
- 3.2 The planned requirements are:
- 12 hours flight time in the 24-month period of rating validity (no change);
  - Up to six hours may be completed in the first 12 months of rating validity; and
  - The training flight may be completed at any time during the validity period of the rating.
- 3.3 As is already the case, holders of SEP and TMG ratings on the PPL(A) may fulfil the requirements in either class of aircraft to revalidate both ratings.
- 3.4 It will be permitted to use three-axis microlight time towards the revalidation of the SEP and TMG ratings for the PPL(A) and existing LAPL(A) holders, provided the licence holder has completed the appropriate differences training for microlights.
- 3.5 For the NPPL(A), the requirements may be met in any aeroplane class the holder is rated on.
- 3.6 Existing LAPL(A) holders will be moved to a fixed validity system, which will require a certificate of revalidation to be completed for each 24-month rating validity period. We will communicate more detail of this in advance of the changes coming into force.

## Chapter 4

# Other issues

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### Combined licence document

- 4.1 We plan to develop a licence document format that combines the privileges of Part-FCL and Air Navigation Order aeroplane licences. This will improve administration when a licence holder wishes to acquire a non-Part 21 aircraft type rating.
- 4.2 Existing licence holders will have the opportunity to apply for the combined licence document if so desired (there would be a charge for this).

### Aerobatic rating

- 4.3 The aerobatic rating will be retained in Part-FCL and extended to holders of new licences issued under the Air Navigation Order, provisionally those first issued after 30<sup>th</sup> September 2025. Holders of existing national licences will be unaffected.
- 4.4 We are also planning to remove the prerequisite experience requirement, since we do not feel it serves a safety purpose.

### Sailplane towing rating

- 4.5 The sailplane towing rating will be removed from Part-FCL. When the changes come into effect, it will no longer be a requirement to hold a rating for towing a sailplane. We anticipate that training as required for towing will continue to be conducted in accordance with British Gliding Association (BGA) policies.
- 4.6 It will remain a requirement under Part-FCL to hold a rating for banner towing.

### Use of non-Part 21 aircraft for Part-FCL training

- 4.7 It is planned to redraft [DTO.GEN.240](#) and [ORA.ATO.135](#) such that to use a non-Part 21 aircraft towards Part-FCL training, the requirements will be:
  - The Head of Training at the ATO or DTO must assess the aircraft as suitable; and
  - A non-Part 21 aircraft with a national permit to fly must have a permission under Article 42 of the Air Navigation Order.
- 4.8 There will not be a need for a separate CAA approval under [DTO.GEN.240](#) or [ORA.ATO.135](#), provided permission under [Article 42](#) is held.
- 4.9 Currently a [general permission \(currently ORS4 1585\)](#) under Article 42 is published covering some operations and national permit to fly aircraft, we have no plans at the moment to alter the scope of this.